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THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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MARTHA NIMMER  
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September 10, 2021

**VIA ECF**

Hon. Jesse M. Furman  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *P.B. v. New York City Dep't of Educ.*, 21-cv-4612 (JMF)(SDA)

Dear Judge Furman:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a 90-day stay of this case, including a stay of the deadline by which Defendant must file its answer. Plaintiff consents to these requests, and has agreed to provide billing records for this matter by September 17, 2021. This is the second request for an extension of the time to answer and the first request for a stay. Defendant's first request for an extension was made on June 14, 2021 and granted by Your Honor that same day.

The requested extension would provide Defendant with sufficient time to review the billing records (once provided) with the administrative record, and obtain settlement authority from the New York City Office of the Comptroller. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time.

Accordingly, Defendant respectfully requests that the action be stayed for 90 days.

Thank you for considering these requests.

Respectfully submitted,

/s/  
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Martha Nimmer, Esq.  
Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)

Application GRANTED. Defendant shall answer or otherwise respond to the Complaint no later than December 14, 2021, in the event this case has not settled by then. The Clerk of Court is directed to terminate ECF No. 16.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Martha Nimmer".

September 13, 2021